

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Mel Carnahan, Governor • David A. Shurr, Director

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

December 12, 1995

Lori Juergens  
Shell Engineering  
2403 West Ash  
Columbia, MO 65203

Dear Ms. Juergens:

We have reviewed your proposal of emission factors for each emission point of the briquetting process. We agree that it is a more acceptable way to calculate emissions for each point source rather than using the one emission factor for the entire briquetting process.

Since the new section of AP-42 still uses the 24.1 pounds per ton for Particulate Matter - ten microns or less for the entire process and does not address the individual steps in the briquetting process, we do not have many options except to borrow emission factors from processes as similar as possible to the briquetting sources of air pollution.

Our original list used emission factors from many other industries and we believe that these factors more closely represent the briquetting processes than the factors you proposed. By breaking down the steps, the total of all the emission factors is already lower than the overall factor of 24.1 pounds per ton of charcoal produced. We would consider revising the emission factors if you can provide documentation or testing.

We have revised our original table to correspond with some of the changes in the new Factor Information Retrieval version of emission factors. We have also deleted the Total Suspended Particulate emission factors since those emissions will not be reported on the 1995 Emissions Inventory Questionnaire forms. The revised table is enclosed for your information.

If you have any questions, please contact Janice Eggen of my staff at (314) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

  
Calvin Ku  
Technical Support Section Chief

CK:jet

c: Randy Raymond, APCP

Enclosure

## CHARCOAL SCCs and Emission Factors

			<u>PM10</u>
1.	Charcoal Kiln		
	3-01-006-03 Batch Kiln		
	SCC Emission Factor (EF)		297.6
	Units: Tons Produced		
	OTHER CRITERIA POLLUTANTS:		
	Nox 24.0 VOC 270 CO 290		
2.	Charcoal Unloading		
	3-07-030-02 Wood Waste Storage Bin Loadout		
	SCC EF		1.2
	Units: Tons		
3.	Charcoal Storage		
	3-05-016-10 Raw Material Storage Piles (Lime)		
	SCC EF		1.40
	Units: Tons		
4.	Charcoal Loading into Bin/Hopper		
	3-07-008-03 Sawdust Pile Handling		
	SCC EF		0.36
	Units: Tons		
5.	Conveying Charcoal/Starch/Lime		
	3-05-016-07 Raw Material Transfer/Conveying (Lime)		
	SCC EF		0.18
	Units: Tons		
6.	Charcoal Crushing		
	3-05-016-01 Primary Crushing (Lime)		
	SCC EF		0.26
	Units: Tons		
7.	Charcoal Loading into Silo/Hopper/Bin		
	3-05-011-07 Cement Unloading: Storage Bins		
	SCC EF		0.14
	Units: Tons		
8.	Pulvarizing Charcoal		
	3-05-016-02 Secondary Crushing		
	SCC EF		1.13
	Units: Tons		
9.	Screening of Granular Charcoal		
	3-05-025-11 Screening Sand/Gravel		
	SCC EF		0.12
	Units: Tons		
10.	Lignite/Sawdust/Coal: If available, use SCCs for that category. If no SCC, use the same as for Charcoal Processing.		

11. Mixing Charcoal Briquet Ingredients  
3-05-011-09 Mixer Loading of Cement/Sand/Aggregate  
SCC EF 0.02  
Units: Tons
12. Charcoal Mix to Bins by Elevator Legs  
3-02-005-08 Feed/Grain Elevator Legs  
SCC EF 0.23  
Units: Tons
13. Roll Press Briquetting  
3-05-016-02 Secondary Crushing/Screening (Lime)  
SCC EF 1.13  
Units: Tons
14. Briquet Drying/Cooling  
3-05-020-12 Stone Drying  
SCC EF 5.0  
Units: Tons
15. Conveying/Handling of Briquets  
3-05-010-11 Coal Transfer  
SCC EF 0.1  
Units: Tons
16. Screening of Briquets  
3-05-010-12 Coal Screening  
SCC EF 0.08  
Units: Tons
17. Bagging of Briquets  
3-01-005-08 Bagging/Loading Carbon Black  
SCC EF 0.06  
Units: Tons
18. Bagging of Granular Charcoal  
3-05-016-14 Packaging/Shipping Lime  
SCC EF 0.12  
Units: Tons

Revised 12/1/95

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